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March 4, 2013

Mr. Jorge Ramirez Director of Disaster Recovery Program Texas General Land Office (GLO) P.O. Box 12373 Austin, TX 78711-2873

RE: Round 2 Program Guidelines Request for Waiver – Waiver Request: #13 – Minimum Housing Design Standards

Dear Mr. Ramirez:

The Lower Rio Grande Valley Development Council (LRGVDC), in its role as subrecipient of funding for the Hurricane Ike/Dolly Round 2 Community Development Block Grant Disaster Recovery Program, believes that it is in the best interest of the residents of Cameron, Hidalgo, and Willacy Counties to deviate from the Statewide Guidelines as written and therefore request a waiver of the Texas General Land Office (GLO), Round 2 Minimum Housing Design Standards.

The Design Standards specify (Section 7.1 D (Page 7 of 19) the required flooring materials for each different living area as follows:

- 1. Living Carpet
- 2. Dining Carpet or Vinyl Tile
- 3. Kitchen Vinyl Tile
- 4. Bedrooms Carpet
- 5. Closets Carpet or Vinyl Tile
- 6. Bathrooms Vinyl Tile
- 7. Utility Vinyl Tile

The LRGVDC has received input from its Housing Advisory Committee, local fair housing advocates, Texas A&M Health Science Center and local health practitioners. As a result of those consultations, we hereby request a waiver granting vinyl tile in all living areas. In support of this waiver request, we have attached documentation from Texas A&M Health Science Center and the New Horizon Medical Center. In addition to the many health concerns, local fair housing advocates stated that most low income families do not have, nor can they afford, a vacuum sweeper. Since both carpet and vinyl tile are allowed in the dining room and closets, granting this waiver should not be considered an upgrade to have one instead of the other.

Page 2 Round 2 Program Guidelines Request for Waiver #13

The LRGVDC respectfully requests that the GLO grant a waiver of the Round 2 Housing Design Standards to allow for vinyl in all living areas.

Submitted by:	
/ - Ine	3/6/13
Kenneth N. Jones, Jr., Executive Director LRGVDC	DATE
Approved by	
Jorge Ramirez, Director of Disaster Recovery	DATE



191 E. Price Road • Brownsville, Texas 78521 - Phone: 956.548.7400 • Fax: 956.546.2056

February 27, 2013

Kristina Loera, Grant Manager-POOL Texas General Land Office PO Box 12873 Austin, TX 78711-2873

Dear Ms. Loera.

Ann Cass, Executive Director of Proyecto Azteca, asked me to write a letter regarding my medical opinion related to indoor allergen triggers for asthma, in particular whether carpet should be installed in the Hurricane Dolly relief housing. I counsel families with asthmatic children on a daily basis to remove all carpeting from their homes, if at all possible. Texas has the highest rates of asthma hospitalizations in the nation, as noted by the CDC. The American Lung Association has documented the heavy burden of asthma on Hispanic families in the Lower Rio Grande Valley. The American Academy of Allergy Asthma & Immunology recommends that families remove carpeting from their homes, because carpet is a reservoir for dust mites, pet dander, pollen and other asthma triggers.

In addition, asthma related housing issues is a major focus of Medical-Legal Partnerships (MLP) nationally; in fact, it is the reason MLP's were started in 1996. A pediatrician in Boston found that his patients kept returning with severe asthma exacerbations, despite preventive medication and education. With further investigation, he found that many of these families lived in housing that had wall-to-wall carpeting. Others were living in cockroach infested housing units. Unable to convince landlords to improve the housing conditions on his own, the pediatrician partnered with attorneys for assistance. There are now over 300 partnerships in teaching hospitals and community health centers throughout the country. We are fortunate to have an MLP at Brownsville Community Health Center.

I tell the story of MLP, because one of our first MLP cases was a young girl with severe persistent asthma living in public housing in Brownsville. She had carpeting throughout her apartment unit and mold in some of the closets, but she did not want to move her children. The landlord told the mother that it was too cost prohibitive to remove the carpet. After much discussion and several meetings with the MLP attorney and pediatrician, the landlord agreed to move the family to a new unit without carpeting and without mold. The child's asthma improved dramatically.

You have the power to prevent such situations from ever happening, at least in the housing authorized through the Texas General Land Office. I stand with the AAP, the AAAAI, the American Lung Association, and MLP's in urging you to require hard surface flooring in your housing. Please do not install carpeting that will later cause health hazards for the families of Texas.

Sincerely,

Marsha R.Griffin, MD

Chief of Pediatrics, Brownsville Community Health Center Medical Director, Brownsville ISD Campus Care Clinics

Director of *Community for Children*, and Clinical Faculty, University of Texas Health Science Center San Antonio (UTHSCSA)



Texas A&M HEALTH SCIENCE CENTER

SCHOOL OF RURAL PUBLIC HEALTH
MCALLEN CAMPUS

February 27,2013

Kristina Loera, Grant Manager-POOL Texas General Land Office PO Box 12873 Austin, TX 78711-2873

Dear Ms. Loera,

As you know, faculty and Master's-level staff at the TAMHSC School of Rural Public Health — McAllen Campus conduct applied research in chronic diseases that are prevalent along the U.S./Mexico Border. Specifically, we have conducted applied research related to pediatric asthma in young children who reside in *colonias* within the County of Hidalgo and our educational efforts have focused on teaching both, the children and their caregivers, how to identify and eliminate asthma triggers in order to better manage asthma symptoms.

Due to the climate in the Rio Grande Valley (high humidity and warm temperatures), the majority of asthma triggers are related to allergens (pets, cockroaches, dust mites, rats/mice, mold, pollens) and irritants (smoke, dust, strong odors). Our research has shown that these triggers are abundant in homes that are carpeted, especially those in *colonias*, due to the overall indoor and outdoor environment. Based on this, we do not recommend that homes that will be re-constructed or newly built with recovery funds from Hurricane Dolly be required to have carpeting. Use of other standard flooring (tile, linoleum, etc.) would decrease the asthma triggers present in the home and thereby, positively impact health and wellbeing.

Thank you, in advance, for your time and attention to this matter. Please do not hesitate to contact us in the event that you should have any questions.

Sincerely,

Genny Carrillo Zunigal M.D., M.P.H., M.S.P.H, Sc.D. Assistant Professor

Department of Environment and Occupational Health

Rose L. Lucio, M.P.H.

Assistant Director, McAllen Campus

Asthma Training Instructor

xc: Olga Gabriel, M.P.H., Director, McAllen Campus